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11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA

13 JAMES OCHOA,

14 Plaintiffs,

15 vs.

16 THE CITY OF BUENA PARK, et al.,

17 Defendants.
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) Case No. SACV 07-443 JVS
) (MLGx)

) **[PROPOSED] PROTECTIVE**
) **ORDER REGARDING**
) **DISCLOSURE OF**
) **DOCUMENTS PRODUCED**
) **IN RESPONSE TO**
) **SUBPOENA TO LARRY**
) **HARRIS**

) *Action Filed: April 20, 2007*
) *Trial: May 20, 2008*

1 **IT IS SO ORDERED:**

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3 Date: March 12, 2008



Honorable Marc L. Goldman
United States Magistrate Judge

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5 **Protective Order:**

6 1. Counsel for Defendants, City of Buena Park, Steve Craig and Kevin
7 Gano shall disclose to counsel for plaintiff, records containing training and
8 maintenance information regarding Trace, records of other cases in which Larry
9 Harris and his bloodhound Trace were involved, records of other Buena Park
10 Police Department cases in which Larry Harris and his bloodhound Trace were
11 involved, and "Case and Training Records" and "Bloodhound Trail Information
12 records."

13 2. Counsel for plaintiff shall not convey, transfer, publish, distribute,
14 copy, duplicate or disseminate the information so provided except as may be
15 reasonably necessary for the prosecution of this litigation, by communicating with
16 plaintiff, or investigators, consultants and experts retained on behalf of the plaintiff
17 in this matter.

18 3. Prior to the dissemination of any such information pursuant to this
19 order, counsel for the plaintiff shall inform such person of the terms and conditions
20 of this order and secure such person's agreement to be bound by it.

21 4. Plaintiff, plaintiff's counsel, and plaintiff's investigators, consultants
22 and experts, are expressly prohibited from utilizing the disclosed information for
23 any purpose other than the prosecution of *James Ochoa v. City of Buena Park*,
24 USDC Case No. 07-00443 JVS (MLGx) and the information disclosed shall not be
25 utilized in any other proceeding or litigation, or for any other purpose.

26 5. Plaintiff, plaintiff's counsel, and plaintiff's investigators, consultants
27 and experts, are expressly prohibited from disclosing orally or otherwise the
28 information subject to this Protective Order to any person other than those who are

1 reasonably necessary for the prosecution of *James Ochoa v. City of Buena Park*,
2 USDC Case No. 07-00443 JVS (MLGx).

3 6. Plaintiff, plaintiff's counsel, and plaintiff's investigators, consultants
4 and experts, are expressly prohibited from duplicating, copying or otherwise
5 distributing or disseminating any of the disclosed information to any person or
6 entity, except as permitted in paragraphs 2-5 above.

7 7. Counsel for each party shall take reasonable precaution to prevent the
8 unauthorized or inadvertent disclosure of any of the protected information.

9 8. In the event anyone shall violate or threaten to violate any terms of
10 this Protective Order, the aggrieved party may immediately apply to obtain relief to
11 this court against any such person violating or threatening to violate any of the
12 terms of this order. This court shall retain jurisdiction over the parties and any
13 other persons subject to the terms of this order for the purpose of enforcing this
14 order. The court shall have the power to impose whatever penalties it deems
15 appropriate for the violation of said order, including, but not limited to, monetary
16 and judicial sanctions and contempt.

17 9. At the final conclusion of this action, all disclosed materials will be
18 returned to the counsel for the Defendants without request and within 60 days of
19 the final judgment, including any appeals, if any.

20 10. This order shall survive the final termination of this action, to the
21 extent that the information disclosed remains confidential and does not become
22 known to the public, and the court shall retain jurisdiction to resolve any dispute
23 concerning the use of the information disclosed herein.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I, Coleen Ludvigson, am employed in the aforesaid County, State of California; I am over the age of 18 years and not a party to the within action. My business address is 1631 East 18th Street, Santa Ana, California 92705-7101.

On March 5, 2008, I served the foregoing **[PROPOSED] PROTECTIVE ORDER REGARDING DISCLOSURE OF DOCUMENTS PRODUCED IN RESPONSE TO SUBPOENA TO LARRY HARRIS** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

Patricio A. Marquez
MORRISON FOERSTER
555 W. Fifth Street
Los Angeles, CA 90013-1024

— (By Mail) I placed such envelope for deposit in accordance with office practice, sealed, with postage thereon fully paid and the correspondence to be deposited in the United States mail at Santa Ana, California on the same day.

xxx (By e-filing) The above noted individuals are registered with the Court to receive notice of electronically filed documents. Per ECF rules, hard copies must be served only on parties who are not set up for electronic notification.

XXX (Federal) I declare under penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 5, 2008, at Santa Ana, California.

/s/ Coleen Ludvigson
Coleen Ludvigson